

AKIN GUMP STRAUSS HAUER & FELD LLP

JULIA I. DE BEERS (SBN 233811)

jdebeers@akingump.com

2029 Century Park East

Suite 2400

Los Angeles, CA 90067

Telephone: 310-229-1000

Facsimile: 310-229-1001

Attorneys for Plaintiffs

DEUTSCHE BANK TRUST COMPANY AMERICAS,

LAW DEBENTURE TRUST COMPANY OF NEW

YORK, AND WILMINGTON TRUST COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEUTSCHE BANK TRUST COMPANY
AMERICAS, et al.

Plaintiffs,

v.

FIRST REPUBLIC BANK, et al.

Defendants.

CLASS ACTION

Case No. C 11-02634 JCS

**STIPULATION TO EXTEND TIME FOR
JONATHAN GARY KEITH AND
EVERYTHING MEDICAL SERVICES,
INC. TO RESPOND TO COMPLAINT
(Local Rule 6-1(a))**

**STIPULATION TO EXTEND TIME FOR DEFENDANTS JONATHAN GARY KEITH AND
EVERYTHING MEDICAL SERVICE, INC. TO RESPOND TO COMPLAINT**

Pursuant to Local Rule 6-1, Plaintiffs Deutsche Bank Trust Company Americas in its capacity as successor indenture trustee for a certain series of Senior Notes ("DBTCA"), Law Debenture Trust Company of New York, in its capacity as successor indenture trustee for a certain series of Senior Notes ("Law Debenture"), and Wilmington Trust Company, in its capacity as successor indenture trustee for the PHONES Notes ("Wilmington Trust" and, together with DBTCA and Law Debenture, "Plaintiffs") by and through their counsel, and Defendants JONATHAN GARY KEITH and EVERYTHING MEDICAL SERVICES, INC. hereby stipulate and agree that the time for Defendants JONATHAN GARY KEITH and EVERYTHING MEDICAL SERVICES, INC. to answer or otherwise respond to the Complaint is extended by sixty days from the date the response to the Complaint would have been due (i.e., 81 days after service of the Complaint, not counting the day it was received), unless the Court orders otherwise.

In accordance with N.D. Cal. General Order No. 45, Section X, the filer of this document hereby attests that the concurrence to the filing of this document has been obtained from the other signatory hereto. A scanned image of the signature page is attached hereto.

Dated: June 27, 2011

AKIN GUMP STRAUSS HAUER & FELD LLP

By /s/ Julia I. De Beers
Julia I. De Beers

Attorneys for Plaintiffs
DEUTSCHE BANK TRUST COMPANY AMERICAS
LAW DEBENTURE TRUST COMPANY OF NEW
YORK AND WILMINGTON TRUST COMPANY

Dated: June 27, 2011

By /s/ Jonathan Gary Keith
JONATHAN GARY KEITH and
AUTHORIZED REPRESENTATIVE OF
EVERYTHING MEDICAL SERVICES, INC.
Defendants

STIPULATION TO EXTEND TIME FOR DEFENDANTS JONATHAN GARY KEITH AND EVERYTHING MEDICAL SERVICE, INC. TO RESPOND TO COMPLAINT

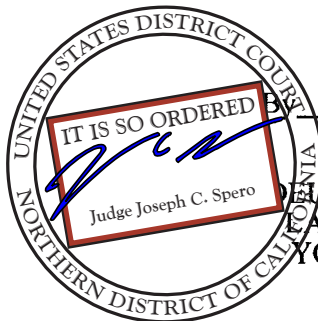
Pursuant to Local Rule 6-1, Plaintiffs Deutsche Bank Trust Company Americas in its capacity as successor indenture trustee for a certain series of Senior Notes ("DBTCA"), Law Debenture Trust Company of New York, in its capacity as successor indenture trustee for a certain series of Senior Notes ("Law Debenture"), and Wilmington Trust Company, in its capacity as successor indenture trustee for the PHONES Notes ("Wilmington Trust" and, together with DBTCA and Law Debenture, "Plaintiffs") by and through their counsel, and Defendants JONATHAN GARY KEITH and EVERYTHING MEDICAL SERVICES, INC. hereby stipulate and agree that the time for Defendants JONATHAN GARY KEITH and EVERYTHING MEDICAL SERVICES, INC. to answer or otherwise respond to the Complaint is extended by sixty days from the date the response to the Complaint would have been due (i.e., 81 days after service of the Complaint, not counting the day it was received), unless the Court orders otherwise.

In accordance with N.D. Cal. General Order No. 45, Section X, the filer of this document hereby attests that the concurrence to the filing of this document has been obtained from the other signatory hereto. A scanned image of the signature page is attached hereto.

Dated: _____, 2011

AKIN GUMP STRAUSS HAUER & FELD LLP

Dated: June 28, 2011



/s/ Julia I. De Beers

Julia I. De Beers

Attorneys for Plaintiffs

DEUTSCHE BANK TRUST COMPANY AMERICAS
LAW DEBENTURE TRUST COMPANY OF NEW
YORK AND WILMINGTON TRUST COMPANY

Dated: JUNE 27th, 2011

By

JONATHAN GARY KEITH and
AUTHORIZED REPRESENTATIVE OF
EVERYTHING MEDICAL SERVICES, INC.
Defendants

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 2029 Century Park East, Suite 2400, Los Angeles, California 90067. On June 27, 2011, I served the foregoing document(s) described as: **STIPULATION TO EXTEND TIME FOR RODOLFO GIL TO RESPOND TO COMPLAINT (Local Rule 6-1(a))** on the interested party(ies) below, using the following means:

Jonathan Gary Keith
200 South Palm Ave., Unit A
Alhambra, CA 91801

Registered Agent of Everything Medical Services
Jonathan Gary Keith
200 South Palm Ave, Unit A
Alhambra CA 91801

☐ BY PERSONAL SERVICE I delivered such envelope(s) by hand to the offices of the addressee(s).

☒ BY UNITED STATES MAIL I enclosed the documents in a sealed envelope or package addressed to the respective address(es) of the party(ies) stated above and placed the envelope(s) for collection and mailing, following our ordinary business practices. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid at Los Angeles, California.

☐ BY OVERNIGHT DELIVERY I enclosed the document(s) in an envelope or package provided by an overnight delivery carrier and addressed to the respective address(es) of the party(ies) stated above. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

☐ BY MESSENGER SERVICE I served the documents by placing them in an envelope or package addressed to the respective address(es) of the party(ies) stated above and providing them to a professional messenger service for service.


☐ BY ELECTRONIC MAIL OR ELECTRONIC TRANSMISSION. Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent to the respective e-mail address(es) of the party(ies) as stated above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on June 27, 2011, at Los Angeles, California.

Jennifer Fukai

[Print Name of Person Executing Proof]


[Signature]